

# **EXHIBIT 24**

BRITTANY A. SHARPTON Non-Confidential  
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<p style="text-align: right;">Page 270</p> <p>1 B. A. SHARPTON</p> <p>2 A. Yes.</p> <p>3 Q. And the subject is "KS and MB are</p> <p>4 in her office." Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. Is MB Margaret Barry?</p> <p>7 A. Yes.</p> <p>8 Q. What was her position?</p> <p>9 A. An analyst.</p> <p>10 Q. Within infrastructure?</p> <p>11 A. Yes.</p> <p>12 Q. When did she leave Citi?</p> <p>13 A. I don't remember exactly when she</p> <p>14 left.</p> <p>15 Q. Was she still at Citi when you</p> <p>16 were let go?</p> <p>17 A. No.</p> <p>18 Q. In your top e-mail you refer to a</p> <p>19 time when "she/they screamed at me for moving</p> <p>20 too slow and making errors." Do you see that?</p> <p>21 A. Yes.</p> <p>22 Q. What time was that when you were</p> <p>23 moving too slow and making errors?</p> <p>24 A. I don't remember.</p> <p>25 Q. Do you remember the project you</p>	<p style="text-align: right;">Page 272</p> <p>1 B. A. SHARPTON</p> <p>2 Q. Did you have a confrontation with</p> <p>3 Ms. Barry?</p> <p>4 A. I had a conversation with Ms.</p> <p>5 Barry. I'm not confrontational at work.</p> <p>6 Q. When you say you had to tell Ms.</p> <p>7 Barry about herself, what did you tell her?</p> <p>8 A. I told her about her behavior,</p> <p>9 that's unacceptable.</p> <p>10 Q. Do you know whether Ms. Pond</p> <p>11 responded to this?</p> <p>12 A. I'm sorry, do I know?</p> <p>13 Q. Whether Ms. Pond responded to this</p> <p>14 e-mail?</p> <p>15 A. I -- let me see.</p> <p>16 Q. It is not in this exhibit.</p> <p>17 A. Oh, I don't know.</p> <p>18 Q. Do you recall her telling you that</p> <p>19 she thinks Kimberly Swain wants to see that</p> <p>20 you are improving?</p> <p>21 A. That's something that sounds like</p> <p>22 Sherrise would say to calm me down.</p> <p>23 Q. Let's look at her response. And</p> <p>24 we will have this chain of e-mails marked as</p> <p>25 Exhibit 20.</p>
<p style="text-align: right;">Page 271</p> <p>1 B. A. SHARPTON</p> <p>2 were working on?</p> <p>3 A. Not exactly.</p> <p>4 Q. How about with less than</p> <p>5 exactitude?</p> <p>6 A. I can make a guess, but I don't</p> <p>7 remember.</p> <p>8 Q. I don't want you to guess. If you</p> <p>9 don't remember, that's fine.</p> <p>10 A. Okay.</p> <p>11 Q. When you are referring to they</p> <p>12 screamed at you for moving too slow and making</p> <p>13 errors, who is the they?</p> <p>14 A. Kimberly Swain and Margaret who</p> <p>15 began to embody a mini Kimberly Swain.</p> <p>16 Q. Do you think they were acting that</p> <p>17 way towards you because of your gender?</p> <p>18 A. I don't know.</p> <p>19 Q. You say, you also then continue</p> <p>20 "the time I had to tell MB about herself, LOL,</p> <p>21 well, that was the time." What are you</p> <p>22 referring to?</p> <p>23 A. When I had to let Margaret know</p> <p>24 that sort of behavior is not tolerable by my</p> <p>25 equal.</p>	<p style="text-align: right;">Page 273</p> <p>1 B. A. SHARPTON</p> <p>2 (Sharpton Exhibit 20, chain of</p> <p>3 e-mails dated December 3, 2007</p> <p>4 between Sherrise Pond and Brittany</p> <p>5 Sharpton marked for identification,</p> <p>6 as of this date.)</p> <p>7 Q. Do you see this top e-mail is more</p> <p>8 on the same chain between you and Ms. Pond?</p> <p>9 A. Yes. Yes, I do.</p> <p>10 Q. And Ms. Pond tells you in that top</p> <p>11 e-mail: "I think for KS" -- is that Kimberly</p> <p>12 Swain?</p> <p>13 A. That is.</p> <p>14 Q. "She just wants to see that you</p> <p>15 are improving. So just think about what</p> <p>16 mistakes you made last time and try to avoid</p> <p>17 making them." Do you see that?</p> <p>18 A. I do.</p> <p>19 Q. Do you think Kimberly Swain wanted</p> <p>20 to see that you were improving?</p> <p>21 A. I would hope everyone would.</p> <p>22 Q. Do you remember what mistakes you</p> <p>23 made last time that Ms. Pond is referring to?</p> <p>24 A. No, I don't remember.</p> <p>25 Q. Do you think you were able to</p>

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<p style="text-align: right;">Page 274</p> <p>1 B. A. SHARPTON</p> <p>2 avoid making the mistakes a second time that</p> <p>3 Ms. Pond refers to?</p> <p>4 A. I hope I was.</p> <p>5 Q. Do you recall one way or the</p> <p>6 other?</p> <p>7 A. I don't know what this is in</p> <p>8 reference to.</p> <p>9 MR. TURNBULL: Let's take a break</p> <p>10 so they can change the tape.</p> <p>11 THE VIDEOGRAPHER: The time is</p> <p>12 4:06 p.m. and this completes tape 4.</p> <p>13 (Recess taken.)</p> <p>14 THE VIDEOGRAPHER: The time is</p> <p>15 4:13 p.m. This is tape No. 5 of the</p> <p>16 videotaped deposition of Ms. Brittany</p> <p>17 Sharpton.</p> <p>18 BY MR. TURNBULL:</p> <p>19 Q. Ms. Sharpton, what was the</p> <p>20 progression track of an analyst?</p> <p>21 A. Our offer letter was for two years</p> <p>22 with potential for an offer for a third year.</p> <p>23 Q. That potential for a third year</p> <p>24 offer, would that be as a third-year analyst?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 276</p> <p>1 B. A. SHARPTON</p> <p>2 your job?</p> <p>3 A. I believe I was good at my job.</p> <p>4 Q. Let me show you what's been marked</p> <p>5 as Exhibit 21.</p> <p>6 (Sharpton Exhibit 21, e-mail</p> <p>7 chain between Brittany Sharpton and</p> <p>8 Sherrise Pond, top e-mail dated</p> <p>9 January 22nd, 2008 marked for</p> <p>10 identification, as of this date.)</p> <p>11 Q. And ask if you recognize that.</p> <p>12 MR. TURNBULL: Exhibit 21 is an</p> <p>13 e-mail chain between you and Sherrise</p> <p>14 Pond the top e-mail is January 22nd,</p> <p>15 2008.</p> <p>16 Q. Do you recognize that?</p> <p>17 A. I do.</p> <p>18 Q. And is that top e-mail an e-mail</p> <p>19 that you typed to Ms. Pond?</p> <p>20 A. I typed that e-mail to Ms. Pond.</p> <p>21 Q. Do you know what you were working</p> <p>22 on at the time you sent this?</p> <p>23 A. I'm not sure.</p> <p>24 Q. Do you see that you say that this</p> <p>25 is taking me entirely too long?</p>
<p style="text-align: right;">Page 275</p> <p>1 B. A. SHARPTON</p> <p>2 Q. After an analyst, what was the</p> <p>3 next position up?</p> <p>4 A. An associate.</p> <p>5 Q. Do you know whether you were</p> <p>6 viewed as being on track to get an offer to</p> <p>7 come back as a third-year analyst?</p> <p>8 A. I don't know how I was viewed.</p> <p>9 Q. Since leaving Citi, have you seen</p> <p>10 any documents that would suggest that you were</p> <p>11 not on track?</p> <p>12 A. Can you clarify what you are</p> <p>13 asking, please.</p> <p>14 Q. Is there any document that you</p> <p>15 have seen since leaving Citi that would</p> <p>16 suggest that you were not on track to get</p> <p>17 asked to remain for a third year as an</p> <p>18 analyst?</p> <p>19 A. I haven't made that inference.</p> <p>20 Q. Is there any document you have</p> <p>21 seen, either during or after your employment</p> <p>22 with Citi, that indicates you were not on</p> <p>23 track to become an associate?</p> <p>24 A. Not that I can recall.</p> <p>25 Q. Do you believe you were good at</p>	<p style="text-align: right;">Page 277</p> <p>1 B. A. SHARPTON</p> <p>2 A. I see that.</p> <p>3 Q. Is that referring to the work you</p> <p>4 were doing?</p> <p>5 A. Yes.</p> <p>6 Q. Do you recall that that was a</p> <p>7 common feeling that you had, that assignments</p> <p>8 you got took you too long to complete?</p> <p>9 A. I had many, many, pessimistic</p> <p>10 ideas about myself that were not necessarily</p> <p>11 conveyed to me by others. These were negative</p> <p>12 self-thoughts.</p> <p>13 Q. Did anybody tell you that you took</p> <p>14 too long to get things done?</p> <p>15 A. Not that I remember.</p> <p>16 Q. You say "she is not happy at all."</p> <p>17 Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. Who is that? Who is she?</p> <p>20 A. That is Kimberly Swain.</p> <p>21 Q. When you said she is not happy,</p> <p>22 was she not happy because it was taking you</p> <p>23 too long?</p> <p>24 A. I don't know why she was not</p> <p>25 happy.</p>

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<p style="text-align: right;">Page 282</p> <p>1 B. A. SHARPTON</p> <p>2 job?</p> <p>3 A. I never thought I was unqualified</p> <p>4 for this job at any point. I still don't.</p> <p>5 Q. Do you --</p> <p>6 A. During that time I'm stressed out.</p> <p>7 This is Brittany Sharpton's personality,</p> <p>8 anxious, anything rattles me, I'm paranoid,</p> <p>9 I'm always thinking the worst, and these</p> <p>10 unfortunate pessimistic thoughts pop up in my</p> <p>11 head.</p> <p>12 Q. Do you recall confiding in your</p> <p>13 confidante that you are not a quant person,</p> <p>14 meaning not a quantitative person?</p> <p>15 A. I was down on myself, who knows</p> <p>16 if, Kimberly probably was chewing me out and</p> <p>17 making me feel this small, and it really takes</p> <p>18 a blow to your self-esteem and that results in</p> <p>19 saying things you don't necessarily mean.</p> <p>20 You tell your parents I wish you'd</p> <p>21 die. You don't want them to die. It's</p> <p>22 something that you feel at that emotional</p> <p>23 time.</p> <p>24 Q. Let me have you look at what's</p> <p>25 been previously marked as Sharpton Exhibit 22.</p>	<p style="text-align: right;">Page 284</p> <p>1 B. A. SHARPTON</p> <p>2 Q. Do you recall sending this e-mail</p> <p>3 to Ms. Pond?</p> <p>4 A. I do.</p> <p>5 Q. Was there anything in here that is</p> <p>6 untrue?</p> <p>7 A. Yes.</p> <p>8 Q. What is untrue in this e-mail that</p> <p>9 you sent to your confidante?</p> <p>10 A. It doesn't take me five years to</p> <p>11 do a simple task like updating, or ten years</p> <p>12 to learn of a simple concept. Many -- I mean,</p> <p>13 these were, the subject is, I wrote a book to</p> <p>14 vent. I'm venting. This is around January.</p> <p>15 I was working on a project with Kimberly. She</p> <p>16 is probably screaming at me.</p> <p>17 I'm just -- I mean, in the third</p> <p>18 paragraph I even write why am I writing this</p> <p>19 crazy letter. I recognized at that point when</p> <p>20 I hopefully was trying to snap out of this</p> <p>21 ridiculous, emotional catharsis, that this is</p> <p>22 absolutely crazy.</p> <p>23 Q. Do you see you start out this</p> <p>24 e-mail saying "I cannot do the most simple</p> <p>25 task and she is furious."</p>
<p style="text-align: right;">Page 283</p> <p>1 B. A. SHARPTON</p> <p>2 It is another e-mail exchange between you and</p> <p>3 Ms. Pond dated January 24, 2008.</p> <p>4 (Sharpton Exhibit 22, e-mail</p> <p>5 exchange between Brittany Sharpton</p> <p>6 and Ms. Pond dated January 24, 2008</p> <p>7 marked for identification, as of</p> <p>8 this date.)</p> <p>9 Q. Do you recognize this document?</p> <p>10 A. I do.</p> <p>11 Q. Do you recognize the e-mail that</p> <p>12 you sent that begins on page 2 of Exhibit 22?</p> <p>13 A. I do.</p> <p>14 Q. This is an e-mail that you sent to</p> <p>15 Ms. Pond?</p> <p>16 A. Yes.</p> <p>17 Q. And Ms. Pond, I think you said, is</p> <p>18 your closest confidante?</p> <p>19 MR. DATOO: Objection.</p> <p>20 A. Ms. Pond is a very good friend of</p> <p>21 mine.</p> <p>22 Q. So do you open up to your friends</p> <p>23 with your feelings?</p> <p>24 A. I express my feelings at times to</p> <p>25 my friends.</p>	<p style="text-align: right;">Page 285</p> <p>1 B. A. SHARPTON</p> <p>2 A. I see that sentence.</p> <p>3 Q. What simple task were you</p> <p>4 referring to that you cannot do?</p> <p>5 A. I don't remember.</p> <p>6 Q. And whatever you were unable to</p> <p>7 do, got Ms. Swain furious. Is that right?</p> <p>8 A. I don't know if that was the</p> <p>9 connection.</p> <p>10 Q. You then continue on and refer to</p> <p>11 work you sent her that you had done a few days</p> <p>12 ago but you didn't save the work you sent her.</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. And then you said "I can't redo it</p> <p>16 quick enough."</p> <p>17 A. I see that sentence.</p> <p>18 Q. And then you say a little after</p> <p>19 that, it says "this reflects horribly on me."</p> <p>20 A. I see that sentence.</p> <p>21 Q. Why did it reflect horribly on</p> <p>22 you?</p> <p>23 A. I strive to be a perfectionist.</p> <p>24 I've always been that way. Like I said, I</p> <p>25 mean, ever since elementary school I will get</p>

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<p style="text-align: right;">Page 290</p> <p>1 B. A. SHARPTON</p> <p>2 yourself that are not true. Is that your</p> <p>3 testimony?</p> <p>4 A. As an emotional response. I look</p> <p>5 in the mirror, I'm like, oh my God, I look fat</p> <p>6 this morning. I mean, I don't know, but I</p> <p>7 don't think I'm fat, so.</p> <p>8 Q. So let me see if I understand.</p> <p>9 Some people deal with stress by smoking</p> <p>10 cigarettes, and you deal with it by making</p> <p>11 things up about yourself?</p> <p>12 MR. DATOO: Objection.</p> <p>13 A. I didn't say I was making things</p> <p>14 up about myself.</p> <p>15 Q. Well, you said you say things that</p> <p>16 aren't true?</p> <p>17 A. As a reaction, my personality.</p> <p>18 Q. That's how you deal with the</p> <p>19 stress?</p> <p>20 A. Let me finish, okay.</p> <p>21 My personality is to cope with</p> <p>22 things when someone has been demeaning you,</p> <p>23 cursing you out, condescending speaking to</p> <p>24 you, you say things that are not not true,</p> <p>25 being pessimistic that no one else thinks but</p>	<p style="text-align: right;">Page 292</p> <p>1 B. A. SHARPTON</p> <p>2 A. The basis of what an analyst</p> <p>3 should is -- I don't know what standards they</p> <p>4 use.</p> <p>5 Q. And then you say: "When will she</p> <p>6 learn just not to work with me? I am not," I</p> <p>7 think it means not, "the type of mind she</p> <p>8 wants with her. She needs a Tanzeer or Matt</p> <p>9 Chin or you."</p> <p>10 Do you see that?</p> <p>11 A. I see that sentence.</p> <p>12 Q. Why are you suggesting that Ms.</p> <p>13 Swain not work with you?</p> <p>14 MR. DATOO: Objection.</p> <p>15 A. I don't work well with the</p> <p>16 screaming management style. I'm not saying</p> <p>17 that maybe we should never work together, but</p> <p>18 her management style and my personality and</p> <p>19 the way I handle stress just don't mesh.</p> <p>20 Q. Let me just look at your own words</p> <p>21 now. You say: "I am not the type of mind she</p> <p>22 wants with her." What does that mean?</p> <p>23 A. I don't know the type of mind that</p> <p>24 Kimberly wants, so of course this is just a</p> <p>25 crazy letter where I'm venting after most</p>
<p style="text-align: right;">Page 291</p> <p>1 B. A. SHARPTON</p> <p>2 at that point in time these thoughts pop up in</p> <p>3 my head.</p> <p>4 Q. I thought I said that. If they</p> <p>5 are not true, are you just making them up?</p> <p>6 A. No.</p> <p>7 Q. You then go on, I take this as</p> <p>8 more hyperbole, "I KNOW," again in all caps,</p> <p>9 "it takes me ten years to learn a simple</p> <p>10 concept." That's more hyperbole; it doesn't</p> <p>11 take you ten years, right?</p> <p>12 A. Right.</p> <p>13 Q. Do you see this next one "I KNOW I</p> <p>14 have not been paying as close attention to</p> <p>15 detail as an analyst should"?</p> <p>16 A. I see that sentence.</p> <p>17 Q. That's the same criticism that was</p> <p>18 reflected in your performance evaluation,</p> <p>19 correct?</p> <p>20 A. That was a comment that was listed</p> <p>21 on my performance evaluation.</p> <p>22 Q. Was that comment that you wrote in</p> <p>23 this e-mail, true, that you did not pay as</p> <p>24 close attention to detail as an analyst</p> <p>25 should?</p>	<p style="text-align: right;">Page 293</p> <p>1 B. A. SHARPTON</p> <p>2 likely being chewed out.</p> <p>3 Q. Do you think that Sherrise Pond</p> <p>4 had more quantitative skills than you?</p> <p>5 A. I never assessed Sherrise's</p> <p>6 skills, but the fact that I even threw her in</p> <p>7 there and she is not even in our group, means</p> <p>8 I'm just writing -- I'm just writing</p> <p>9 emotionally. Kimberly would never use</p> <p>10 Sherrise anyway. So attached to this is a</p> <p>11 crazy letter.</p> <p>12 Q. Tanzeer wasn't in your group,</p> <p>13 either, was she?</p> <p>14 A. He, Tanzeer, was in our group.</p> <p>15 Q. Oh, Tanzeer is a he? I thought</p> <p>16 earlier in the deposition you referred to --</p> <p>17 A. Tazreen is a woman. Tanzeer is a</p> <p>18 man.</p> <p>19 Q. Oh. Tanzeer was let go in a</p> <p>20 reduction in force, correct?</p> <p>21 A. Tanzeer quit I believe.</p> <p>22 Q. And why did you think Ms. Swain</p> <p>23 needs someone like Tanzeer rather than you to</p> <p>24 work with?</p> <p>25 A. I don't know. I was just a stream</p>

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<p style="text-align: right;">Page 342</p> <p>1 B. A. SHARPTON</p> <p>2 your phone number?</p> <p>3 A. I did not.</p> <p>4 MR. TURNBULL: Why don't we change</p> <p>5 the tape now.</p> <p>6 THE VIDEOGRAPHER: The time is</p> <p>7 5:28 p.m. and this completes tape 5.</p> <p>8 (Recess taken.)</p> <p>9 THE VIDEOGRAPHER: The time is</p> <p>10 5:37 p.m. and this is tape No. 6 of the</p> <p>11 videotaped deposition of Ms. Brittany</p> <p>12 Sharpton.</p> <p>13 BY MR. TURNBULL:</p> <p>14 Q. Ms. Sharpton, it is your belief</p> <p>15 that another analyst should have been</p> <p>16 terminated rather than you. Is that right?</p> <p>17 A. I believe that I should not have</p> <p>18 been terminated.</p> <p>19 Q. Is it your belief that you were</p> <p>20 better qualified than Matthew Chin?</p> <p>21 A. At least as qualified.</p> <p>22 Q. But not better qualified?</p> <p>23 A. Certainly at least as qualified.</p> <p>24 I don't know -- at least as qualified.</p> <p>25 Q. So you viewed you and Mr. Chin as</p>	<p style="text-align: right;">Page 344</p> <p>1 B. A. SHARPTON</p> <p>2 experience in public finance before joining</p> <p>3 Citi?</p> <p>4 A. I'm not sure of his background.</p> <p>5 Q. Who did Mr. Chin work with most</p> <p>6 while he was an analyst?</p> <p>7 A. Dave Livingstone.</p> <p>8 Q. What position was Dave, what</p> <p>9 title?</p> <p>10 A. MD.</p> <p>11 Q. Do you know why Mr. Chin worked</p> <p>12 mostly with Mr. Livingstone?</p> <p>13 A. I don't know.</p> <p>14 Q. Do you know what Mr. Livingstone's</p> <p>15 views were of his abilities?</p> <p>16 A. I don't know.</p> <p>17 Q. You said earlier that Mr. Chin was</p> <p>18 told not to work with one of the bankers in</p> <p>19 the group?</p> <p>20 A. Yes.</p> <p>21 Q. And I think that was Ms. McLean,</p> <p>22 is that right?</p> <p>23 A. Yes.</p> <p>24 Q. Why was he told not to work with</p> <p>25 her?</p>
<p style="text-align: right;">Page 343</p> <p>1 B. A. SHARPTON</p> <p>2 equals?</p> <p>3 MR. DATOO: Objection.</p> <p>4 A. I feel like I'm at least as</p> <p>5 qualified.</p> <p>6 Q. Why is it that you reference your</p> <p>7 tenure at Citigroup. Do you think that</p> <p>8 reflects on your qualifications?</p> <p>9 A. Can you rephrase your question?</p> <p>10 Q. I think earlier you testified that</p> <p>11 one of the reasons you thought you were as</p> <p>12 qualified as Mr. Chin is because you had more</p> <p>13 time at Citi than he did.</p> <p>14 A. I said that I have more experience</p> <p>15 at Citi.</p> <p>16 Q. And do you think that translates</p> <p>17 into who is more qualified?</p> <p>18 A. Not necessarily.</p> <p>19 Q. Do you know what Mr. Chin's</p> <p>20 experience was before he came to Citi?</p> <p>21 A. I don't.</p> <p>22 Q. Do you know where he worked before</p> <p>23 he came to Citi?</p> <p>24 A. I'm not sure.</p> <p>25 Q. Do you know whether he had</p>	<p style="text-align: right;">Page 345</p> <p>1 B. A. SHARPTON</p> <p>2 First of all, back up for a</p> <p>3 second. Who told him not to work with her?</p> <p>4 A. I heard that it was Tom Green that</p> <p>5 instructed them not to work together because</p> <p>6 they had a very public and unprofessional</p> <p>7 outburst at work, and they were instructed not</p> <p>8 to work together any more. Matt went off on</p> <p>9 Mathilde.</p> <p>10 Q. Did you hear Mr. Green instruct</p> <p>11 Mr. Chin not to work with her?</p> <p>12 A. I heard -- not physically hear,</p> <p>13 but -- I was not in the room.</p> <p>14 Q. So you did not hear Mr. Green give</p> <p>15 that instruction?</p> <p>16 A. I was not in the room when that</p> <p>17 instruction was given.</p> <p>18 Q. Who told you that that was an</p> <p>19 instruction given to Mr. Chin?</p> <p>20 A. Matthew Chin told me.</p> <p>21 Q. Do you think it is unprofessional</p> <p>22 to have an altercation with a coworker at</p> <p>23 work?</p> <p>24 A. In the manner that it occurred</p> <p>25 with Mathilde and Kathy, that was pretty</p>